

2 UNIVERSITY PLAZA, SUITE 402, HACKENSACK, NJ 07601  
T. 201.265.6400 F. 201.265.0303

1441 BROADWAY, SUITE 6022, NEW YORK, NY 10018  
T. 212.354.0111

October 28, 2019

**VIA ECF**

Honorable Pamela K. Chen  
United States District Judge  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Freeman, et al. v. HSBC Holdings plc, et al.*, 14-cv-6601 (PKC)(CLP)**

Dear Judge Chen:

Plaintiffs respectfully write to alert the Court to new authority in support of their Motion for Partial Reconsideration, ECF No. 239, as well as to preserve this record supplement for appeal. On Friday, October 25, 2019, the U.S. Treasury Department's Financial Crimes Enforcement Network ("FinCEN") issued a Final Rule pursuant to 31 U.S.C. § 5318A, prohibiting the maintenance of, or processing transactions through, correspondent accounts in the U.S. for Iranian financial institutions. See Release, FinCEN, *Imposition of Fifth Special Measure against the Islamic Republic of Iran as a Jurisdiction of Primary Money Laundering Concern* (signed Oct. 24, 2019), at 1, available at [https://www.fincen.gov/sites/default/files/2019-10/Iran%20311%20Final%20Rule\\_20191025\\_508.pdf](https://www.fincen.gov/sites/default/files/2019-10/Iran%20311%20Final%20Rule_20191025_508.pdf) (attached hereto as Exhibit A).

Respectfully submitted,

/s/ Gary M. Osen

cc: All counsel (via ECF)